

Amdt. dated July 14, 2005
Reply to Office action of May 16, 2005

Serial No. 09/809,759
Docket No. ROC920000170US1
Firm No. 0021.0013

REMARKS/ARGUMENTS

Claims 1-54 are in the case. The applicants have studied the office action dated May 16, 2005 and believe the application is in condition for allowance. Reconsideration and reexamination are respectfully requested.

In the present claim listing, the label for claim 20 has been changed to "original". In the prior amendment, claim 20 had been inadvertently labeled "currently amended" notwithstanding that no amendments were made to claim 20. Accordingly, the label for claim 20 has been corrected to "original". Applicants thank the Examiner for the courtesy of a telephone interview July 13, 2005 in which the Examiner confirmed that this is the correct procedure.

Claims 1-54 have been rejected under 35 U.S.C. Sec. 103(b) as being unpatentable over Montalbano, U.S. Pat. No. 5,918,237 in view of Anupam et al, U.S. Pat. No. 6535912. This rejection is respectfully traversed.

Claim 1, for example, is directed to a "computer implemented method for verifying a network address, comprising: *inter alia*, accessing a network address included within a file; ... providing a substitute network address if the accessed content did not satisfy the qualifying threshold ; and in response to a user input, substituting within the file the substitute network address for the accessed network address." It is noted that the Examiner has clearly failed to cite any teaching or suggestion, in either the Montalbano reference, or the Anupam reference, considered either alone, or in combination, of the recited "in response to a user input, substituting within the file the substitute network address for the accessed network address" as required by claim 1. It is therefore respectfully submitted that the rejection of the claims should be withdrawn.

Moreover, the Examiner concedes that the Montalbano reference "does not specifically teach providing a substitute address if a threshold is not satisfied, and substituting accordingly." It appears to be the Examiner's position that this deficiency of the Montalbano reference is met by the Examiner's citations to the Anupam reference. More specifically the Examiner has cited the Anupam reference as teaching "heuristics

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for finding the best alternative match of a URL to be substituted accordingly”
However, the Examiner’s citations to the Anupam reference make clear that either the heuristics find a match or the playback is aborted. The Examiner has failed to cite any role of a user in the operations of the Montalbano or Anupam devices, in which “in response to a user input” there occurs “substituting within the file the substitute network address for the accessed network address” as required by claim 1.

It is noted that the Examiner has cited one role of a user in the operation of the Montalbano device, that is, a user is provided the opportunity to “Click here to find out more.” The Examiner has cited no portion of the Montalbano or Anupam references which teaches or suggests that a user clicking on a video to learn more about a product will in any manner cause “substituting within the file the substitute network address for the accessed network address” as required by claim 1. Indeed, if the user does click on the video, presumably the correct network address was accessed and there would be no motivation to substitute a different address. Conversely, if the user fails to click on the video, there could be no substituting “in response to a user input.” Accordingly, the Examiner has clearly failed to cite any proper motivation to combine the Montalbano and Anupam references.

It is further noted that the Examiner has cited one role of a user in the operation of the Anupam device, that is, a user is provided the opportunity to “provide an input between each or selected pages before a next page is retrieved.” This user input appears to be either a “proceed”, “pause” or “resume” playback command. The Examiner has cited no portion of the Montalbano or Anupam references which teaches or suggests that a user is provided an opportunity to use an input to cause “substituting within the file the [provided] substitute network address for the accessed network address” as required by claim 1. Instead, it appears that the device of the Anupam reference accesses a network address, or a substitute network address or aborts, independently of any user input, once playback is initiated. Thus, even if the references were combined in the manner suggested by the Examiner, a position disputed by the applicants, such a combination would clearly fail to provide the recited “in response to a user input, substituting within

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the file the substitute network address for the accessed network address" as required by claim 1.

Independent claims 19 and 37 may be distinguished in a similar manner.

The rejection of the dependent claims is improper for the reasons given above. Furthermore, the dependent claims include additional limitations, which in combination with the base and intervening claims from which they depend provide still further grounds of patentability over the cited art.

The Examiner has made various comments concerning the obviousness of certain features of the present inventions. Applicants respectfully disagree. Applicants have addressed those comments directly hereinabove or the Examiner's comments are deemed moot in view of the above response.

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Conclusion

For all the above reasons, Applicants submit that the pending claims 1-54 are patentable over the art of record. Applicants have not added any claims. Nonetheless, should any additional fees be required, please charge Deposit Account No. 50-0585.

The attorney of record invites the Examiner to contact him at (310) 553-7977 if the Examiner believes such contact would advance the prosecution of the case.

Dated: July 14, 2005

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